

**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
BEFORE ADMINISTRATIVE LAW JUDGE LAUREN ESPOSITO**

LEWIS FOODS OF 42ND STREET, LLC A
McDONALD'S FRANCHISEE, AND
McDONALD'S USA, LLC, JOINT
EMPLOYERS, et al.

Case Nos. 02-CA-093893, et al.
04-CA-125567, et al.
13-CA-106490, et al.
20-CA-132103, et al.
25-CA-114819, et al.
31-CA-127447, et al.

and

FAST FOOD WORKERS COMMITTEE
AND SERVICE EMPLOYEES
INTERNATIONAL UNION, CTW, CLC, et
al.

**REQUEST OF L.R. HODGES & ASSOCIATES LTD. TO JOIN MOTION FOR PROTECTIVE
ORDER FILED BY CHARGING PARTY SEIU**

LR Hodges & Associates, Ltd. ("LRH&A"), a nonparty to this proceeding that has been served with a subpoena *duces tecum* by charged party McDonald's USA, LLC ("McDonald's"), hereby joins the motion for protective order filed by charging party Service Employees International Union ("SEIU").

Although LRH&A has not had an opportunity to review the documents that are responsive to the broad subpoena that respondent McDonald's served on it one week ago, it knows that it is likely to possess materials in the same protected categories as those identified by SEIU in its motion for a protective order. LRH&A connection with this matter is based exclusively on its engagement to provide investigative services to SEIU and its counsel and consequently any information it has acquired in the course of its investigation are likely to be the same materials that SEIU is seeking to protect in its motion.

In addition to the objections raised in the SEIU objections, LRH&A is prohibited from providing the information sought by McDonald's USA in its subpoena by The California Private Investigator Act (Cal. Bus. & Prof. Code § 7512 et seq.), section 7539.

Because the grounds in support of SEIU's motion apply equally to LRH&A and because it would be cumbersome and inefficient to have a multiplicity of different protective orders in place for this litigation, LRH&A requests that SEIU's motion be granted and the proposed protective order appended to that motion be made applicable to all discovery, including third-party discovery, in this matter.

Respectfully submitted,

/s/

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